

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street,  
San Francisco, CA 94104  
Telephone: (415) 439-1400  
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
Christopher D. Cox (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com  
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

PLAINTIFF B.F.  
Case No. 3:25-cv-04466

PLAINTIFF H.S.01  
Case No. 3:25-cv-01999

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.  
COTTON IN SUPPORT OF UBER'S  
ADMINISTRATIVE MOTION TO SEAL  
PERSONAL IDENTIFYING INFORMATION  
CONTAINED IN DEFENDANTS' REPLY IN  
SUPPORT OF MOTION FOR ENTRY OF  
RECEIPTS ORDER AND ACCOMPANYING  
DOCUMENTS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber  
3 Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer this  
4 Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Seal Personal  
5 Identifying Information Contained in Defendants’ Reply in Support of Motion for Entry of Receipts Order  
6 and Accompanying Documents (the “Sealing Motion”).

7 2. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana  
8 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s  
9 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide  
10 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain  
11 Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did not oppose  
12 sealing PII, including counsel from Chaffin Luhana who serves as part of Plaintiffs’ Leadership in this  
13 matter. The Court granted Uber’s motion to seal. ECF 3616. Part of the sealed information contained in  
14 the instant Sealing Motion is a subset of the PII that has already been filed under seal, unopposed by the  
15 Nachawati and Chaffin Luhana firms.

16 3. Counsel for Uber also previously made diligent efforts to meet and confer with Plaintiffs’  
17 counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an Order to Show  
18 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with  
19 Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to seal the PII in that  
20 motion. ECF 3783-1. Part of the sealed information contained in the instant Sealing Motion is a subset  
21 of the PII that was included in Uber’s prior motion to seal.

22 I declare under penalty of perjury under the laws of the State of California and the laws of the  
23 United States of America that the foregoing is true and correct.

1 Dated: September 5, 2025

Respectfully submitted,

3 

4 By: \_\_\_\_\_

Christopher V. Cotton (admitted *Pro Hac Vice*)

**SHOOK, HARDY & BACON L.L.P.**

2555 Grand Blvd.

Kansas City, MO 64108

Telephone: (816) 474-6550

ccotton@shb.com

*Attorney for Defendants*

UBER TECHNOLOGIES, INC.; RASIER,  
LLC; and RASIER-CA, LLC